

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS MUTUAL LIFE
INSURANCE COMPANY,

Plaintiff,

v.

CREDIT SUISSE FIRST BOSTON MORTGAGE
SECURITIES CORP.; MORTGAGE ASSET
SECURITIZATION TRANSACTIONS, INC.; DLJ
MORTGAGE CAPITAL, INC.; UBS REAL ESTATE
SECURITIES INC.; CREDIT SUISSE SECURITIES
(USA) LLC; UBS SECURITIES LLC; LEE FARKAS;
PAUL R. ALLEN; RAY BOWMAN; DELTON
DE' ARMAS; DESIREE E. BROWN; ANDREW A.
KIMURA; JEFFREY A. ALTABEF; EVELYN
ECHEVARRIA; MICHAEL A. MARRIOTT;
THOMAS ZINGALLI; DAVID MARTIN; PER
DYRVIK; HUGH CORCORAN; and PETER
SLAGOWITZ,

Defendants.

Civil Action No. 3:11-30048-MAP

**ASSENTED-TO MOTION FOR EXTENSION OF TIME FOR MASSMUTUAL
TO MOVE TO STRIKE CERTAIN DEFENSES
ASSERTED IN DEFENDANTS' ANSWERS, AND EXTENSION OF TIME FOR
DEFENDANTS TO AMEND THEIR ANSWERS**

Plaintiff Massachusetts Mutual Life Insurance Company (“MassMutual”) hereby moves for an extension of its time to move to strike certain defenses asserted in the answers filed in the above-captioned action (the “Action”), as stipulated to by the parties, through their undersigned counsel, as set forth below. Defendants Credit Suisse Securities (USA) LLC and UBS Securities LLC (collectively, “Defendants”), through their undersigned counsel, assent to the motion.

MassMutual commenced the Action by filing a complaint (the “Complaint”) in the United States District Court for the District of Massachusetts against Defendants, among others. On March 20, 2012, Defendants filed their answers (the “Answers”) to the Complaint.

MassMutual intends to file a motion to strike certain defenses asserted in the Answers, which is due on or before April 13, 2012 pursuant to Federal Rules of Civil Procedure 6(d) and 12(f).

To allow MassMutual and Defendants sufficient time to meet and confer in an attempt to narrow the defenses that will be the subject of the motion to strike, MassMutual and Defendants have conferred and stipulate and agree, subject to the approval of the Court, as follows:

1. The time for MassMutual to file a motion to strike certain defenses asserted in the Answers shall be extended up to and including April 27, 2012.
2. In addition, the time for Defendants to amend their Answers shall be extended up to and including April 25, 2012. If an amended answer is filed, the time for MassMutual to file any motion to strike shall be further extended up to and including May 9, 2012. MassMutual and Defendants agree that if an amended answer is filed, MassMutual need not conduct an additional meet and confer prior to filing any motion to strike.

3. Any motion by MassMutual to strike defenses in the Answers or any amended answers shall be briefed according to the following schedule (in addition to the deadlines set forth above for the filing of MassMutual's motion to strike):

- a) Defendants' opposition(s) due 28 days after filing of the motion to strike;
- b) MassMutual shall be afforded the right to a reply brief, which shall be due 14 days after filing of Defendants' opposition(s).

WHEREFORE, the parties respectfully request that this Court:

- 1. Grant the instant motion to enter an Order per the terms stipulated to by the parties, as set forth herein.
- 2. Grant such further relief as may be just and proper.

DATED: April 13, 2012

Respectfully submitted,

/s/ Edward J. McDonough Jr.

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Counsel for Defendant Credit Suisse Securities (USA) LLC

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 13th day of April, 2012.

/s/ Edward J. McDonough Jr.

Edward J. McDonough Jr.